

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION**

OLD TOWN PIZZA OF LOMBARD, INC.,	)	
an Illinois Corporation, individually and as the	)	
representative of a class of similarly situated persons,	)	
	)	
Plaintiffs,	)	
	)	
Vs.	)	11 CV
	)	Case being removed:
G.W. JONES HEATING & COOLING, INC., and	)	2011 CH 4717
John Does 1-10.	)	19 <sup>th</sup> Judicial Circuit
	)	Lake County, Illinois
Defendants.	)	

**NOTICE OF REMOVAL**

To: Brian J. Wanca  
ANDERSON + WANCA  
3701 Algonquin Road, Suite 760  
Rolling Meadows, IL 6008

Phillip A. Bock  
BOCK & HATCH, LLC  
134 N. LaSalle St., Suite 1000  
Chicago, IL 60602

**PLEASE TAKE NOTICE THAT:**

Defendant G.W. Jones Heating & Cooling, Inc., (“Jones”), through its undersigned attorneys, hereby removes this case from the Circuit Court for the Nineteenth Judicial Circuit, Lake County, Illinois, where it is pending as Case No. 11 CH 4717, for the following reasons:

1. This case was filed in the Circuit Court for the Nineteenth Judicial Circuit, Lake County, Illinois, on October 20, 2011.
2. Defendant Jones was served with a copy of the Summons and Complaint on October 21, 2011.
3. This notice of removal is timely pursuant to 28 U.S.C. § 1446(b) since it is being filed within 30 days of the Defendant being served.
4. The Complaint filed by the Plaintiffs and against the Defendants alleges violation of the federal Telephone Consumer Protection Act, 47 U.S.C. §227 *et seq.*
5. Accordingly, this Court has jurisdiction pursuant to 28 U.S.C. §1331 in that the action arises under a law of the United States.
6. Copies of the papers served on Defendant Jones are attached to this Notice as Exhibit A.

WHEREFORE, Defendant Jones requests that the above captioned case pending in the Circuit Court for the Nineteenth Judicial Circuit, Lake County, Illinois, be removed to the United States District Court for the Northern District of Illinois.

Respectfully Submitted,  
G.W. JONES HEATING & COOLING, INC.,

By: /s/ George L. Grumley

George L. Grumley      ARDC #10771938  
Richard C. Carey      ARDC# 6296032  
GRUMLEY, KAMIN & ROSIC, LLC  
Three First National Plaza  
70 W. Madison, Suite 2100  
Chicago, IL 60602  
312-994-9004 (o) \* 312-994-0541 (f)

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, certify that I sent the foregoing **Notice of Removal** to the parties listed below via first class mail, postage pre-paid, on November 21, 2011.

Brian J. Wanca  
ANDERSON + WANCA  
3701 Algonquin Road, Suite 760  
Rolling Meadows, IL 60008

Phillip A. Bock  
BOCK & HATCH, LLC  
134 N. LaSalle St., Suite 1000  
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/s/ Richard C. Carey  
Richard C. Carey  
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